

Dana J. Oliver, Esq. (SBN: 291082)
dana@danaoliverlaw.com
OLIVER LAW CENTER, INC.
8780 19th Street #559
Rancho Cucamonga, CA 91701
Telephone: (855)384-3262
Facsimile: (888)570-2021

Attorney for Plaintiff and Putative Class
Additional Attorneys on Signature Page

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

MIRYAM ABITBOL, individually and
on behalf of all others similarly situated,

Plaintiff,

1

CURRENT ENERGY LLC

AND

KEVIN ADAMS

Defendants.

Case No.

2:24-cv-08132-FLA-BFM

JOINT REQUEST FOR
TELEPHNIC APPEARANCE
ON JANUARY 31 OR TO
CONTINUE HEARING

Hearing

Date: January 31, 2025

Time: 1:30 PM

Courtroom: 6B

Hon. Fernando L. Aenlle-Rocha

**Complaint Served: Sept 26, 2024
Trial Date: None Set**

Counsel for Plaintiff, Miryam Abitbol (“Plaintiff”), and Defendants Current Energy LLC and Kevin Adams (“Defendants”) hereby request to be permitted to appear telephonically at the January 31, 2025 hearing on the Defendants’ Motion

1 to Dismiss in this matter, or in the alternative, to reschedule the hearing. Counsel
2 make this request based on the following:

3 1. Plaintiff's counsel is located in Glenside, Pennsylvania. It will cost
4 considerable time and expense for Plaintiff's counsel to attend the Court's Hearing
5 in-person. As such, a personal appearance will cause an undue hardship. Plaintiff's
6 counsel is also defending a deposition that was previously scheduled for the early
7 portion of the same day, and will be able to meet both obligations only if the
8 hearing is conducted virtually.

9 2. Defendants' lead counsel is located in Holland, Michigan. The cost the
10 defendants will incur for counsel to appear for the hearing in-person will be
11 considerable. As such, a personal appearance will cause an undue hardship.

12 3. Moreover, both counsel for Plaintiff and for Defendants have made emailed
13 requests to Twyla Freeman, per the Court's direction on its website, in an effort to
14 attend the hearing virtually, but received no response.

15 4. In the alternative, counsel for Plaintiff and Defendants respectfully request
16 that the Court continue the hearing to Friday, February 21, to permit the
17 undersigned counsel to make travel arrangements and resolve scheduling conflicts.

18 5. As this is a joint request, neither Counsel is opposed to this relief. Given this
19 additional consideration, and practicalities that it would impose if one party
20 attended in person and another party attended virtually, and given the further
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1 scheduling difficulties that the Parties are unable to account for owing to the
2 shortened remaining time frame here, it furthers the interests of justice and the
3 spirit of FED. R. CIV P. 1 to permit attendance via telephone/Zoom for all Counsel
4 or alternatively reschedule the hearing in person for February 21.

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6 Respectfully submitted,
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9 Dated: January 28, 2025

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11 Respectfully submitted,
12 /s/ Andrew Roman Perrong
13 Andrew Roman Perrong, Esq.
14 PA Bar #333687 (*Pro Hac Vice*)
15 Perrong Law LLC
16 2657 Mount Carmel Avenue
17 Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

18
19 /s/ John D. Fitzpatrick
20 John D. Fitzpatrick
21 MI Bar #P85884 (admitted *pro hac vice*)
22 Cunningham Dalman PC
23 321 Settlers Road
Holland, MI 49422-1767
(616) 392-1821
jfitzpatrick@cunninghamdalman.com
Attorneys for Defendants

1 **ATTESTATION OF SIGNATURE**

2 Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that
3 the content of this document is acceptable to counsel for Defendants, and I obtained
4 their authorization to affix his electronic signature to this document.

5
6 Dated: January 28, 2025

7 */s/ Andrew Roman Perrong*
8 Andrew Roman Perrong, Esq.
9

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that, on January 28, 2025, I caused the foregoing to be
12 electronically filed with the Clerk using the CM/ECF system, which will send
13 notification of such filing to all counsel of record.
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16 */s/ Andrew R. Perrong*
17 Andrew R. Perrong
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